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Date:

Dear Dr. Gibbs:

**CONTRACT NO. DE-AC27-96RL13308 – W375 – RESPONSE TO SELF-ASSESSMENT
AND CORRECTIVE ACTION INSPECTION REPORT, IR-00-004 (CCN 013762)**

Reference: CCN 013762, Letter, D. C. Gibbs DOE/RL, to P. O. Strawbridge, BNFL Inc.,
“Self-Assessment and Corrective Action Inspection Report, IR-00-004,”
00-RU-0402, dated May 31, 2000.

This letter and attachments are being issued as our complete response to the referenced letter.

From April 24-May 1, 2000, the Office of Safety Regulation (Regulatory Unit) performed an inspection of the BNFL Inc. (BNFL) self-assessment and corrective action programs. As a result of the inspection, the Regulatory Unit identified three findings.

The findings are identified as follows:

1. Inadequate quality improvement procedures. (Attachment 1)
2. Twelve examples of untimely corrective actions associated with deficiency reports. (Attachment 2)
3. Three examples of failure to follow procedures: 1) failure to write a Corrective Action Report when a Deficiency Report was classified as significant, 2) failure to write a Deficiency Report when a surveillance identified document control errors, 3) failure to generate Deficiency Reports for deficiencies identified by outside entities. (Attachment 3)

As a stop work order effective June 29, 2000 was issued and the contract between BNFL and the U.S. Department of Energy has been terminated effective July 28, 2000, BNFL has reviewed the findings identified in inspection report IR-00-004 and provides the attached responses as suggested corrective actions for the succeeding contractor.

BNFL has determined that the conditions described in the self-assessment and corrective action inspection findings represent a noncompliance with Department of Energy nuclear safety requirements and that these conditions are reportable externally under 10 CFR Part 820, Appendix A. BNFL has entered these findings in the internal Corrective Active Management

System. BNFL probably would have reported this condition to the Noncompliance Tracking System in accordance with the guidance of the Department of Energy Office of Enforcement and Investigation; however, a stop work order was issued and therefore this report will not be done. BNFL will use this information in its company lessons learned program.

Also provided is a disk in Microsoft Word format containing this letter and attachments (Attachment 4).

If you have any questions or if we can be of further assistance, please call Carole Younger at (509) 371-4857.

Yours sincerely,

A. J. Dobson
Manager, Operations and Safety

KDL/jca